

Town of Worcester

WORCESTER, VERMONT 05682

February 1st, 2024

Department of Forests, Parks and Recreation,
c/o Brad Greenough, Stewardship Forester,
5 Perry Street, Suite 20,
Barre, VT 05641-4265

By Email to ANR.WRMUPublicComment@vermont.gov

Dear Vermont Commissioner of Forest Parks & Recreation,

The Planning Commission of the Town of Worcester submits the following comments on the Management Plan for State-Owned Lands in the Worcester Range Management Unit. The Planning Commission fully supports the current work of the Vermont Housing and Conservation Board to implement the first phases of Act 59, the *Vermont Community Resilience and Biodiversity Act*, and urge the Agency of Natural Resources to **delay adoption of a Management Plan for the WRMU until after the VHCB has presented a Comprehensive Conservation Plan to the legislature in 2025.**

The Worcester Planning Commission is made up of four residents appointed by the Worcester Selectboard. Our Planning Commission celebrated the adoption of a new Town Plan in 2023, after years of work by current and former Commissioners to draft the 2023 Town Plan. The newly adopted Town Plan reflects the central role that the Worcester Range plays in the lives and hearts of Worcester residents. The future of the Worcester Range is vitally important to our citizens and the Planning Commission appreciates your considerations of these comments.

2019 Community Survey for Town Planning

In 2019 the Planning Commission surveyed Worcester residents with a 7% response rate. In the 2019 Survey, citizens were asked the following question: "What do you like about Worcester?"¹

- 86% rated forests as Very important
- 86% rated wildlife as Very important
- 85% rated mountains as Very important

Town Plan

The Worcester Town Plan states "Conservation and sustainable use of the land and its resources form the very heart of the Worcester Town Plan." Goal 6 of our Town Plan is to "Conserve and protect the Town's important natural resources of water, mountains and their ridgelines, open spaces, air, soil, wildlife habitat, historic structures, and viewsapes. Particular

¹ The Community Survey asked "What do you like about Worcester?" and to rate their response as Not important, Somewhat important, or Very important to their lives. Among the 16 options, respondents ranked "clean environment" first, followed by "close to nature" second, and "landscape", "wildlife" and "forests" tied for third. The survey also asked "What aspects of Worcester do you want to see unchanged?" with the opportunity to input open ended responses. Two of the three most common responses were "open space" and "everything".

attention should be given to State-Designated and Worcester-Defined Natural and Fragile Areas.” The Plan directs the Planning Commission and the Selectboard to “Investigate regulatory and non-regulatory methods for preserving important farm and forest lands....”

Significance of the Worcester Range Management District

For the town of Worcester, there is no more significant or defining geographic feature than the Worcester Range, and no forest lands more important. Rising across Worcester’s western border, the mountains are visible from many points around town and Worcester’s residents live in relationship to the mountains and their downslopes. As the ANR’s Draft Long Range Management Plan states, “The WRMU is of exceptional ecological importance at local, statewide and regional scales.” The plan notes rare and uncommon plant species, biodiversity, wildlife connectivity with significance within and far beyond Vermont’s borders, and the WRMU’s contribution to ecosystem resilience by offering species opportunities for relatively unhindered movement in response to climate change. These forests host trees up to 120 years old and provide vital habitat to many wildlife species, including endangered long-eared bats and Bicknell’s Thrush, as well as a range of wildlife species dependent on interior forest habitat that is rare elsewhere in Vermont. The Worcester Range is the largest mountain range in Vermont without resort development and bisecting roads, and the Management District is the largest functional contiguous wildland in northern Vermont.

Vermont Community Resilience and Biodiversity Protection Act

The Vermont Legislature’s 2023 passage of [Act 59](#), the *Vermont Community Resilience and Biodiversity Protection Act*, established targets to conserve 30% of the state’s land by 2030 and 50% by 2050, and emphasized the importance of protecting natural habitats and biodiversity and building on the [Vermont Conservation Design](#) framework².

The *Community Resilience and Biodiversity Protection Act* directs the Vermont Housing and Conservation Board to [inventory](#) conserved lands in Vermont by July 1st, 2024³. The VHCB is currently engaged in this process, creating multiple pathways for public input including focus groups, public roundtables, interviews, survey, public meetings and work groups.

The act also directs the VHCB to develop a state-wide conservation plan by December 31st, 2025 which will lay out strategies for managing land and protecting biodiversity to achieve the act’s conservation goals.

A key question being explored through the inventory process is “what ‘counts’ as conserved land”. The VHCB is directed to more fully define three types of conserved lands: “Ecological reserve areas”, “Biodiversity conservation areas”, and “Natural resource management areas”.

² *Vermont Conservation Design* identifies “increasing the amount of both young and old forest in the state as highest priority for maintaining an ecologically functional landscape,” and notes that “allowing about 9% of Vermont’s forest... to become old forest will bring this missing component back to Vermont’s landscape and offer confidence that species that benefit from or depend on this condition can persist.”

³ The inventory must address a list of specific topics, exploring existing conservation practices, perspectives of experts and professionals in the field as well as the general public, data on conservation, and options for conservation in the future and improving equity in strategies, programs and access.

It is imperative that the information collected by the inventory be used to inform the development of a Management Plan for the WRMU prior to its adoption and/or implementation.

Recommendation: We urge the Agency of Natural Resources to delay adoption of a Management Plan for the WRMU until after the VHCB has presented a Comprehensive Conservation Plan to the legislature in 2025.

The Planning Commission sees tremendous value in the ongoing processes led by the VHCB to achieve the goals of the 2023 *Vermont Community Resilience and Biodiversity Protection Act*. These efforts will have profound implications for town, regional and statewide planning for management of our precious forest lands.

The people of Worcester, our region, and our state, have a right to as much current information as possible to inform our input to something as significant as Vermont's first Management Plan for our beloved Worcester Range. Delaying the adoption of the plan would give the experts time to hear from the public and develop a coordinated long range plan for conservation in Vermont that would inform plans for the WRMU.

Thank you for your careful consideration of our comments. We welcome your questions and suggestions.

The Worcester Planning Commission
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